



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

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In Reply  
Refer to: H-3-3  
EPA ID# CAD 009 164 021

J.C. Harmon, Manager  
Environmental Conservation  
Shell Oil Company  
Martinez Manufacturing Complex  
P.O. Box 711  
Martinez, CA 94553

RE: EPA Corrective Action Requirements at Shell

Dear Mr. Harmon:

I am writing to discuss environmental corrective action at Shell's Martinez Manufacturing Complex. On March 6, 1989, EPA Region 9 issued a RCRA §3008(h) order to Shell Oil Company Martinez Manufacturing Complex to investigate and mitigate past releases to the environment. A RCRA permit issued to Shell on May 8, 1990 also contained these same requirements, including submitting a RCRA Facility Investigation (RFI) Workplan, performing an RFI to characterize environmental contamination, and then performing a Corrective Measures Study (CMS) to identify and evaluate alternatives for corrective action.

While we realize Shell has been working on these and similar issues in conjunction with the Regional Water Quality Control Board, still the technical requirements of the RFI and CMS have not been fulfilled.

I am enclosing two documents prepared by an EPA contractor: *Technical Review of Documents: Current Conditions* (for Shell Oil Company, dated May 23, 1991); and *Technical Review of Documents: Investigation and Corrective Action Reports* (for Shell Oil Company, dated November 6, 1991).

Please review these documents and provide us with the following:

1. A response to the conclusions on page 31 of the Review of Investigation and Corrective Action Reports, including an update of the current situation.
2. A summary of any Interim Measures taken.
3. Identification of any newly-discovered Solid Waste Management Units (SWMUs), or newly-discovered releases at existing SWMUs.
4. A discussion of what, if anything, needs to be done to

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complete an RFI. (This discussion could take the form of an RFI Workplan.)

5. Submission of documentation of previous characterization that could be considered part of the RFI. You can refer to documents already submitted to EPA.

In addition, an RFI Final Report and Corrective Measures Study ultimately will need to be submitted to EPA.

Please respond to items 1 through 5 above within 45 days of this letter. If you have any questions, please contact John McCarroll of my staff at (415) 744-2057.

Sincerely,

*Larry Bowerman*

Larry Bowerman, Chief  
Alternative Technology Section

cc: Karen Toth, DTSC Region 2 (without enclosures)  
Dan F. Murphy, DTSC Region 2 (without enclosures)  
✓ Steven Ritchie, RWQCB (without enclosures)